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Attorneys for Plaintiffs

_____	:	UNITED STATES DISTRICT COURT
JASON HILL and AISHA HILL, his wife,	:	DISTRICT OF NEW JERSEY
	:	
Plaintiff,	:	CIVIL ACTION NO.
	:	
v.	:	
	:	COMPLAINT
UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	
_____	:	

Plaintiffs, Jason Hill and Aisha Hill, his wife, state the following by way of complaint against the defendant:

THE PARTIES, JURISDICTION AND VENUE

1. The plaintiffs, Jason Hill and Aisha Hill, his wife, reside in the City of Jersey City, County of Hudson, State of New Jersey.
2. The defendant, United States of America, through its designated agency, the Federal Bureau of Investigation, operates out of 26 Federal Plaza, in the City of New York, County of New York, State of New York.
3. At all relevant times, defendant's employee, Agent Lovjit K. Mann was acting within the scope of her office or employment as an employee of the Federal Bureau of Investigation.

4. The jurisdiction of this Court is invoked pursuant to 28 USC § 1346(b), commonly known as the Federal Tort Claims Act, wherein, exclusive jurisdiction is granted for all civil actions on claims against the United States for money damages due to personal injury caused by the negligence of any employee or agency of the government.

5. Venue is laid in this judicial district pursuant to 28 USC § 1391(a).

#### FIRST COUNT

6. On or about October 28, 2015, plaintiff, JASON HILL, was a pedestrian lawfully crossing the Well Fargo parking lot located at 145 6th Street, Jersey City, New Jersey.

7. On or about October 28, 2015, the defendant's employee, Agent Lovjit K. Mann was operating a vehicle owned by the Delario Corporation which was pulling out of a parking space in the Well Fargo parking lot located at 145 6th Street, Jersey City, New Jersey.

8. At the aforesaid time, the defendant, the United States of America, through its employee, Agent Lovjit K. Mann, was negligent in the operation of her vehicle in that she struck and seriously injured the plaintiff JASON HILL.

9. The defendant, United States of America, through its employee, Agent Lovjit K. Mann was negligent in the operation of her vehicle in that, *inter alia*,

- a. she failed to make proper and necessary look out;
- b. made a negligent and careless acceleration;
- c. failed to drive safely and lost control of her vehicle;
- d. operated at an unreasonable and unsafe speed under the conditions;
- e. failed to yield to a pedestrian;
- f. made a negligent and hazardous maneuver; and/or
- g. failed to avoid the plaintiff, JASON HILL, thereby creating a dangerous and hazardous situation for the person of the plaintiff, and said defendant was otherwise negligent, reckless and/or careless.

10. At the aforementioned time and place, the defendant, United States of America, through its respective agents, servants, and employees, negligently and carelessly, failed to make proper and necessary look out, made a negligent and careless acceleration, failed to drive safely and lost control of the vehicle, operation at an unreasonable and unsafe speed under the conditions, failed to yield to a pedestrian, made a negligent and hazardous maneuver and created dangerous and hazardous situation for the customers, patrons, and business invitees, including the plaintiff, JASON HILL, at the premises.

11. As a direct and proximate result of the negligence of the defendant, United States of America, the plaintiff, JASON HILL, was injured by the motor vehicle sustaining severe bodily injuries, was painfully and permanently injured, incurred, and in the future will incur, medical expenses in an effort to cure himself of his injuries, and was otherwise prevented from attending to his regular pursuits, employment, duties and obligations.

12. In accordance with the requirements of the law, a Standard Form 95 Claim For Damage, Injury, or Death, was filed on behalf of the plaintiffs in this matter in a timely fashion, on April 27, 2017. A formal denial of said claim has not been issued and the claim has been left without action by the agency for six months and the bringing of this action is within six months therefrom.

WHEREFORE, plaintiff, JASON HILL, demands judgment on this count against the defendant, United States of America, for compensatory damages in the sum of \$755,504.00, interest, and costs of suit.

#### SECOND COUNT

13. The plaintiff, Aisha Hill, repeats and realleges each and every allegation of the First Count as if fully set forth herein at length.

14. Aisha Hill is, and at all times herein mentioned was, the wife of the plaintiff, Jason Hill.

15. As a direct and proximate result of the negligence of the defendant, United States of America, as previously set forth herein, the plaintiff, Aisha Hill, was deprived of the

services, society, and consortium of her husband, incurred, and will incur in the future, medical expenses in an effort to cure her husband of his injuries, and has otherwise been injured to her great detriment.

WHEREFORE, plaintiff, Aisha Hill, demands judgment on this count against the defendant, United States of America, for compensatory damages in the sum of \$500,000, interest and costs of suit.

NOTICE OF DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Michael J. Forrester, Esq. as Trial Counsel.

s/Michael J. Forrester  
MICHAEL J. FORRESTER, ESQ. ( MF9807)

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DATE: November 1, 2017